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4 Illinois
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6 New Jersey
7 Oregon
8 Massachusetts
9 Connecticut

May 16, 2024

Hon. Leslie G. Foschio
United States District Court
2 Niagara Square
Buffalo, New York 14202

RE: Martin Gugino v. City of Buffalo, et al.
Case No.: 1:21-cv-00283 (LJV/LGF)

Dear Judge Foschio:

I am writing on behalf of both parties to request a joint ninety (90) day extension of all deadlines.

The parties respectfully seek the extension for good cause because we continue to await orders on pending discovery motions, which if successful will necessitate additional party and non-party depositions.

In addition, dates were set for additional defendant party and non-party depositions, however, they were recently adjourned due to witness unavailability.

Finally, defendants have requested additional time to respond to some of plaintiff's outstanding discovery demands, and plaintiff understands that a final production will be forthcoming in the near future.

Plaintiff proposes the following deposition dates:

Defendant Lockwood on June 18 or June 20;
Defendant DeGeorge on June 20 or June 21; and
the City Clerk on June 24.

We appreciate the Court's consideration of this request.

Sincerely,

LIPSITZ GREEN SCIME CAMBRIA LLP

/s/ Melissa D. Wischerath
Melissa D. Wischerath, Esq.

cc: Hugh M. Russ , III and Peter A. Sahasrabudhe

